

EXHIBIT “A”

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ICAZA, BURGESS, & GROSSMAN, P.C. RECEIVED
550 BROAD STREET
SUITE 703
NEWARK, NEW JERSEY 07102
(973) 799-0700

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NJ ATTORNEY ID: 019581990

Attorneys for Plaintiff
FABIO GALEANO,

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: MIDDLESEX COUNTY
DOCKET NO:

Plaintiff,

vs.

CIVIL ACTION

ERLYN PINEDA-CASTRO, CDN LOGISTICS,
INC., JOHN DOE (name being
fictitious) and ABC CORPORATION
(name being fictitious),

Complaint and Demand
for Jury Trial

Defendants

The Plaintiff, Fabio Galeano residing at 219 Murray Street, in the City of Elizabeth, County of Union, and State of New Jersey, says the following by way of Complaint against the Defendants:

FIRST COUNT

1. On or about November 10, 2017, the Plaintiff, Fabio Galeano, was loading a truck when suddenly the truck moved forward causing him to fall down to the ground at 140 Docks Corner Road, Loading Docks, in the Township of South Brunswick, County of Middlesex, and State of New Jersey.

2. At the time and place aforesaid, the Defendant, Erlyn Pineda-Castro and/or John Doe (name being fictitious) was the

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operator of a motor vehicle, as the Agent, Servant and/or Employee of the owner of the vehicle, defendant, CDN Logistics Inc., and/or ABC Corporation (name being fictitious).

3. The Defendants so negligently operated their motor vehicle as to cause a collision to occur.

4. As a result of the negligence of the Defendants, the Plaintiff sustained severe and grievous personal injuries, has incurred and will in the future incur great medical expense, and has endured and will in the future endure great pain and suffering.

W H E R E F O R E, the Plaintiff demands judgment against the Defendants for damages, interest and costs.

JURY DEMAND

The Plaintiffs hereby demand a trial by jury as to all issues contained herein.

ICAZA, BURGESS, & GROSSMAN, P.C.

BY:  JUAN L. ICAZA


Dated: January 4, 2019

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DESIGNATION OF TRIAL COUNSEL

In accordance with R.4:5-1 (c), Douglas D. Burgess, Esq.,
Attorney ID: 043121992 is hereby designated as trial counsel.

ICAZA, BURGESS, & GROSSMAN, P.C.

BY: JUAN L. ICAZA 

Dated: January 4, 2019

CERTIFICATION

I certify that the matter in controversy is not the
subject of any pending action or arbitration proceeding, and that
no other such action or arbitration is contemplated.




ICAZA, BURGESS, & GROSSMAN, P.C.

BY: JUAN L. ICAZA 

Dated: January 4, 2019

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Appendix XII-B1

|  CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed | | FOR CLERK'S OFFICE ONLY | |
|---|---|--|------------------------------|
| | | PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA | CHG/CK NO. |
| ATTORNEY / PRO SE NAME JUAN L. ICAZA, ESQ. | | TELEPHONE NUMBER (973) 799-0700 | COUNTY OF VENUE Middlesex |
| FIRM NAME (if applicable) ICAZA, BURGESS & GROSSMAN, P.C. | | DOCKET NUMBER (when available) MID-L- | |
| OFFICE ADDRESS 550 BROAD STREET, SUITE 703, NEWARK, NEW JERSEY 07102 | | DOCUMENT TYPE COMPLAINT | |
| NAME OF PARTY (e.g., John Doe, Plaintiff) FABIO GALEANO | | CAPTION GALEANO VS. PINEDA-CASTRO, ET ALS. | |
| CASE TYPE NUMBER (See reverse side for listing) 603N | HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. | |
| RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | IF YES, LIST DOCKET NUMBERS | |
| DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) GREAT WEST INSURANCE CO. <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN | |
| THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE. | | | |
| CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION | | | |
| DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS | |
| DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | | |
| USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION | | | |
|  DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO | | IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION | |
| WILL AN INTERPRETER BE NEEDED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO | | IF YES, FOR WHAT LANGUAGE? SPANISH | |
| I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b). | | | |
| ATTORNEY SIGNATURE:  | | | |